

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

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LG. PHILIPS LCD CO., LTD, )  
                                )  
                                )  
Plaintiff,                 )  
                                )  
                                )  
v.                            ) CIVIL ACTION NO. CV-04 11076 (RCL)  
MICHELE B. BOVIO &         )  
ROBERT C. FRAME,            )  
                                )  
Defendants.                 )  
                                )

U.S. DISTRICT COURT  
DISTRICT OF MASS.

**DECLARATION OF MARTHA J. HOPKINS IN SUPPORT OF LPL'S  
OPPOSITION TO DEFENDANT BOVIO'S MOTION FOR LEAVE TO FILE  
REPLY IN SUPPORT OF HIS MOTION TO DISMISS**

I, Martha J. Hopkins, declare:

1. I am an attorney licensed to practice in the District of Columbia, Virginia, and before the U.S. Patent and Trademark Office. I am an associate in the Washington, D.C. office of the law firm of Morgan, Lewis & Bockius, LLP. I have personal knowledge of the matters stated herein, and if called to testify, could and would testify competently thereto.

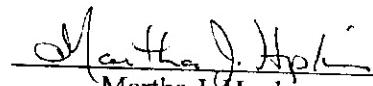
2. In or about September 3, 2004, in connection with preparing the opposition ("opposition") of LG.Philips LCD Co., Ltd. ("LPL") to Defendant Bovio's motion to dismiss, I conducted an internet search for the name of Bovio's company, Carena & Associati, by typing the words "Carena & Associati" in the Google® search engine. I performed that same search today and obtained the same search results as I did when I

was preparing LPL's opposition. A true and accurate copy of the results of my search today are attached hereto as Exhibit A.

3. Next, from the search result obtained by typing "Carena & Associati" in Google®, I selected the link to "www.counterfeit-detectors.us/ChimeAlert.html," which took me to a webpage with the title "ETEST" across the top of the page." Selecting that link today from the search results in Exhibit A, I again was taken to the same "ETEST" webpage. A true and accurate copy of the "ETEST" page that I found today is attached hereto as exhibit B. These are the same pages as the last three pages in Exhibit 37 to the declaration of Anthony C. Roth in support of LPL's opposition to Bovio's motion to dismiss. On page 1 of Exhibit B, Security Tree is listed as the distributor of ETEST and on page 2 of Exhibit B, Carena & Associati is listed as the manufacturer of ETEST. On page 3 of Exhibit B, there is a copyright date of 2003.

I affirm under penalty of perjury that the foregoing is true and correct.

Dated: October 7, 2004

  
\_\_\_\_\_  
Martha J. Hopkins

## EXHIBIT A

Google Search: "Carena &amp; Associati"

Page 1 of 2



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["Carena & Associati"](#)

[Search](#) [Advanced Search](#)  
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Results 1 - 5 of about 10 for "Carena & Associati". (0.67 seconds)

[tm.thesign.com/portfolio/carena\\_e\\_associati.html](#) - [ Cached ]  
... **carena & associati srl** consulenza nel campo della ricerca, lo sviluppo  
e l'ingegnerizzazione della produzione, realizzazione: concept - grafica - produzione. ...  
[www.tmthesign.com/portfolio/web\\_carena.html](#) - 11k - [ Cached ] - [ Images ] - [ Details ]

[lITrovatore Directory Italia : Affari e Finanza/Aziende ...](#) - [ Cached ]  
... Commenta questo sito! **Carena & associati** Si occupa di consulenza e supporto nel  
campo della progettazione, prototipazione e ingegnerizzazione della produzione. ...  
[www.litrovatore.it//.../pages/Affari\\_e\\_Finanza/Aziende/Elettronica\\_e\\_Elettrotecnica/more10.html](#) - 38k - Oct 5, 2004 - [ Cached ] - [ Images ] - [ Details ]

[engineering manufacturing - carena & associati](#) - [ Cached ]  
**Carena & Associati** can provide Research and Development, Engineering and Manufacturing,  
ensuring the quality and reliability of the final products. ...  
[www.carena-associati.it/](#) - 5k - Supplemental Result - [ Cached ] - [ Images ] - [ Details ]

### **Carena & Associati Srl**

... Copyright 2002 - **Carena & Associati Srl**.  
[www.carena-associati.it/services.html](#) - 7k - Supplemental Result - [ Cached ] - [ Images ] - [ Details ]

### **ChimeAlert counterfeit-detectors**

... well as numerous other currencies. Who makes it? **Carena & Associati Srl**  
of Ivrea, Italy. This engineering research and design firm ...  
[www.counterfeit-detectors.us/ChimeAlert.html](#) - 16k - Supplemental Result - [ Cached ] - [ Images ] - [ Details ]

*In order to show you the most relevant results, we have omitted some entries very similar to the 5 already displayed.  
If you like, you can repeat the search with the omitted results included.*

Google Search: "Carena & Associati"

Page 2 of 2

"Carena & Associati"

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## EXHIBIT B

# E TEST

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Security Tree™ is a direct distributor of the  
counterfeit currency detector.

(e'test), a hand-held electro-magnetic

Use to test for counterfeit US and Canadian dollars, bank checks and travelers checks, and  
a number of foreign currencies.

Designed for ease of use and portability, the battery-powered  
and sonic signals to alert you to suspect currency.

uses a combination of visual

**Merchants – Protect your business from counterfeiters.** Use the e-test to help verify the legitimacy of suspect currency, checks, and travelers checks. Unlike most other counterfeit detection devices, the hand-held e-test does not take up scarce space around your register. Loop a thin cable or chain through the mounting hole to attach it to your register station so that it is always available. Post the included security sticker on your register or door to put counterfeiters on notice that you test suspicious currency and checks.

**What is Etest?**

The ChimeAlert is a small, hand-held electronic scanner used for currency validation. It's easy to use, checking for the presence of magnetic ink as you slide it over the surface of the currency, check, or travelers check. The ChimeAlert is light-weight, easy to use, and small enough to carry easily in a pocket or purse. Use the small hole molded into the case, to attach to a check-out counter or to your key chain.

### **How does it work?**

Much like the playback head on a tape recorder, the sensor on the ChimeAlert detects the presence and quantity of the magnetic particles of the special inks used to foil counterfeiting. These inks are manufactured with specific characteristics and are used only on certain portions of a note. Not only does the ChimeAlert detect the presence of a magnetic ink, it also checks for the proper characteristics and strength of the ink.

When you slide the head across an area of a bank note or check printed with magnetic ink, a tone is sounded and a green LED lights up. If there is no magnetic ink present, or if either the strength or characteristics of the ink is not correct, no tone is sounded and the green LED remains off.

### **Does it work on all currencies?**

The ChimeAlert works on all checks, travelers checks, and bank notes that use magnetic inks as a counterfeit deterrence. Magnetic inks are used in American checks, travelers checks, and currency; Canadian dollars, Euro dollars, UK pounds, Swiss Francs, and Japanese Yen, as well as numerous other currencies.

### **Who makes it?**

Carena & Associati S.r.l. of Ivrea, Italy. This engineering research and design firm has a strong presence in making magnetic pastes and inks as well as in the design and manufacture of equipment used for application control and detection of magnetic pastes and inks.

## **Device Characteristics**

ChimeAlert counterfeit-detectors

Page 3 of 3

- Magnetic ink detection
- Audio/optic feedback
- Battery 12v Type V23GA, VR22
- Size: 2.5" x 0.5"
- Weight 1 oz